

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

09/16/22

04:59 PM

R2110002

Order Instituting Rulemaking to Oversee the  
Resource Adequacy Program, Consider  
Program Reforms and Refinements, and  
Establish Forward Resource Adequacy  
Procurement Obligations.

R.21-10-002  
(Filed October 7, 2021)

**JOINT CCAS' MOTION FOR SHORTENED TIME TO RESPOND TO MOTION FOR  
CLARIFICATION**

Jeremy Waen  
**PENINSULA CLEAN ENERGY**  
2075 Woodside Road  
Redwood City, CA 94601  
Phone: 650-247-8026  
jwaen@peninsulacleanenergy.com

Hilary Staver  
**CENTRAL COAST COMMUNITY ENERGY**  
70 Garden Court, Suite 300  
Monterey, CA 93940  
Phone: (831) 257-4001  
hstaver@3ce.com

September 16, 2022

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Oversee the  
Resource Adequacy Program, Consider  
Program Reforms and Refinements, and  
Establish Forward Resource Adequacy  
Procurement Obligations.

---

R.21-10-002  
(Filed October 7, 2021)

**JOINT CCAS' MOTION FOR SHORTENED TIME TO RESPOND TO MOTION FOR  
CLARIFICATION**

Pursuant to Rule 11.1 of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure ("Rules"), Central Coast Community Energy ("CCCE") and Peninsula Clean Energy ("PCE") (collectively, "Joint CCAs") respectfully request that the Commission shorten the time to five days for responses to the Joint CCAs' *Motion for Clarification of Impact of Central Procurement Entity Structure on System Resource Adequacy Obligations* ("Motion for Clarification") concurrently filed in the captioned proceeding or in the alternative to rule on the Motion for Clarification prior to the time for responses. If this motion for shortened time is granted, responses will be due on September 21, 2022.

Rule 11.1(e) provides that parties have 15 days to respond to written motions (resulting in a September 29, 2022 response date) unless the ALJ sets a different date. Good cause exists, however, to shorten parties' time to respond to Joint CCAs' Motion for Clarification. The Joint CCAs' are requesting clarification of the system resource adequacy obligation and all LSEs must make a compliance showing on or before October 31, 2022. Given the current uncertainty regarding procurement obligations, the Joint CCAs need clarity from the Commission in order to complete their procurement processes. The longer the uncertainty persists, the less able all LSEs

will be to meet system RA compliance obligations. Thus, it is imperative that the Commission grant this motion to shorten time, so that LSEs can complete their procurement efforts.

If no opposition is filed, the time required for a response would be unnecessary and delay the Commission's response to the Motion for Clarification. Notwithstanding, should parties seek to submit a response, a shortened five-day period would not prejudice the parties because the clarification sought from the Commission would benefit all LSEs.

Accordingly, for the reasons set forth above, Joint CCAs respectfully requests that the Commission shorten the time for responses to the Motion for Clarification to five days so that responses will be due by September 21, 2022.

Dated: September 16, 2022

Respectfully submitted,

/s/ Hilary Staver

Hilary Staver  
**CENTRAL COAST COMMUNITY ENERGY**  
70 Garden Court, Suite 300  
Monterey, CA 93940  
Telephone: (831) 257-4001  
E-mail: [hstaver@3ce.com](mailto:hstaver@3ce.com)

/s/ Jeremy Waen

Jeremy Waen  
Director of Regulatory Policy  
**PENINSULA CLEAN ENERGY**  
2075 Woodside Road  
Redwood City, CA 94601  
Phone: 650-247-8026  
[jwaen@peninsulacleanenergy.com](mailto:jwaen@peninsulacleanenergy.com)